

Message

From: Fondahl, Lauren [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8FCC41D8B83844B3B5483FE20B153452-LFONDAHL]
Sent: 2/27/2013 4:59:21 PM
To: Prat, Rachel@Waterboards [Rachel.Prat@waterboards.ca.gov]
Subject: RE: Question on Biosolids

Hi Pat,

If the biosolids are Class A EQ, then the prohibitions from applying biosolids to a wetlands in 40 CFR 503.14(b)) do not apply, so the project would be allowable. (I'm double-checking with our HQ people but don't think there are other provisions regarding wetlands). There is a general prohibition in the Clean Water Act to discharging sewage sludge to navigable waters of the U.S.

What method will the City of Eureka be using to achieve Class A pathogen reduction?

Thanks,

Lauren Fondahl
Biosolids Coordinator, WTR-5
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From: Prat, Rachel@Waterboards [<mailto:Rachel.Prat@waterboards.ca.gov>]
Sent: Tuesday, February 26, 2013 4:13 PM
To: Fondahl, Lauren
Subject: Question on Biosolids

Hi Lauren,

My name is Rachel Prat and I'm an Environmental Scientist working at the North Coast Regional Water Quality Control Board in Santa Rosa.
I've been directed by my co-workers, Lisa Bernard and Charles Reed, to reach out to you for assistance with a question I have regarding Biosolids.

My question is with regards to an inquiry I have received from an engineering consultant working for the City of Eureka. The consultant wants my office to issue individual waste discharge requirements (WDRs) to the City of Eureka for the land application of liquid (3% to 5% solids) Class A, EQ Biosolids to diked bay agricultural wetlands which are dry during the summer months. The land application site has historically been used for the production of animal feed (farmed wetlands) and most recently has been used for the grazing of cattle during dry-weather conditions.

The US Army Corps of Engineers, the Coastal Commission, US Fish and Wildlife, NOAA Fisheries and the California Department of Fish and Wildlife (formerly Fish and Game) all agree with the project and have no objections. The Army Corps of Engineers will not be issuing a 404 permit because they do not consider the Biosolids to qualify as a fill material and the Coastal Commission issued a permit for the activity back in 1984 and feels the historic permit is still appropriate.

My understanding of the Part 503 CWA requirements is that this activity would be authorized, is this correct?

Thank you for your help,
Rachel

Rachel Prat
Environmental Scientist
Watershed Protection Division

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